

# EXHIBIT 130

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,  
MARISSA BLAIR, TYLER MAGILL, APRIL  
MUNIZ, HANNAH PEARCE, MARCUS  
MARTIN, NATALIE ROMERO, CHELSEA  
ALVARADO, and JOHN DOE,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,  
CHRISTOPHER CANTWELL, JAMES  
ALEX FIELDS, JR., VANGUARD  
AMERICA, ANDREW ANGLIN,  
MOONBASE HOLDINGS, LLC, ROBERT  
“AZZMADOR” RAY, NATHAN DAMIGO,  
ELLIOT KLINE a/k/a ELI MOSLEY,  
IDENTITY EVROPA, MATTHEW  
HEIMBACH, MATTHEW PARROTT a/k/a  
DAVID MATTHEW PARROTT,  
TRADITIONALIST WORKER PARTY,  
MICHAEL HILL, MICHAEL TUBBS,  
LEAGUE OF THE SOUTH, JEFF SCHOEPP,  
NATIONAL SOCIALIST MOVEMENT,  
NATIONALIST FRONT, AUGUSTUS SOL  
INVICTUS, FRATERNAL ORDER OF THE  
ALT-KNIGHTS, MICHAEL “ENOCH”  
PEINOVICH, LOYAL WHITE KNIGHTS OF  
THE KU KLUX KLAN, and EAST COAST  
KNIGHTS OF THE KU KLUX KLAN a/k/a  
EAST COAST KNIGHTS OF THE TRUE  
INVISIBLE EMPIRE,

Defendants.

**Civil Action No. 3:17-cv-00072-NKM**

**MICHAEL TUBBS’S SECOND  
SUPPLEMENT TO HIS  
ANSWER TO  
PLAINTIFFS’ FIRST SET OF  
INTERROGATORIES TO ALL  
DEFENDANTS**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure (“FRCP”), Plaintiffs hereby request that Defendants answer under oath the First Set of Interrogatories

R. The masculine includes the feminine and neutral genders.

S. Unless otherwise specified, the time period to which these Interrogatories refer is from January 1, 2015 to the present.

### **INTERROGATORIES**

1. Identify all means of communication used by you to communicate concerning the Events, whether before, during, or after the Events, and for each means of communication, identify all names, aliases, e-mail addresses, phone numbers, and Social Media Handles you used in connection with such communications, including the 18-digit account identifier associated with any Discord account used by You. Means of communications include, but are not limited to, telephone calls, in-person meetings, and all means of electronic communication including, for example, Social Media, email, SMS messages, podcasts, and online video.

- a. Telephone calls
  - a. [Redacted PII] T-Mobile
  - b. in person meetings
  - c. personal computer
  - d. Email
    - a. [Redacted PII]
    - b. [Redacted PII]
  - e. Facebook, screennames:
    - a. Michael Tubbs
    - b. Mike Sable

2. Identify any “channel” or “server” on Discord to which you had access.

- a. Tubbs had access to some channels but does not remember which ones

3. Identify all persons (natural or non-natural) with whom you communicated concerning the Events, whether before, during, or after the Events.

- a. Michael Hill, [Redacted PII]
- b. Ike [Redacted PII]
- c. Spencer [Redacted PII] [Redacted PII]
- d. Cesar [Redacted PII]
- e. Matthew Heimbach

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**VERIFICATION**

I hereby declare under penalty of perjury that the facts stated in the foregoing are true and correct to the best of my knowledge, information, and belief and that I have complied with the instructions and definitions to the best of my ability.

Michael R. Tubbs  
Michael Tubbs